

TISHAURA O. JONES

TREASURER CITY OF SAINT LOUIS MISSOURI

February 7, 2014

To Whom It May Concern.

Pursuant to City Ordinance #64457, the Funds Committee, consisting of the Mayor, the Comptroller, and the Treasurer is required each year to evaluate the financial institutions seeking to be City depositories. This process must be completed no later than June 1, 2014.

The Treasurer's office has the authority to encourage banks and financial institutions to increase their financial commitment to the revitalization of the City through mortgage and home improvement loans to credit-worthy individuals and through commercial loans to facilitate development and redevelopment throughout the City. Additionally, it shall be the duty of the Treasurer to advertise annually, by February 1, for the submission, by March 1 in each year, of applications from regularly organized national and state depositories insured by the Federal Deposit Insurance Corporation for certification as depositories for funds of the City.

In the past, the Treasurer's Office has neglected to have a formal application process. This year, we are instituting a more robust application process and will be asking for more information from financial institutions that are either currently City depositories or interested in being a City depository institution.

This year, the application process requires the following data:

- **1. Residential Loans.** Data for the last calendar year for each census tract in the City of St. Louis. Data should include:
 - a. One- to four-family home purchase loans
 - b. Refinance home loans
 - c. Home improvement loans
 - d. Home equity loans
 - e. Multi-family loans
 - f. Loans to non-occupant owners of single family properties
 - g. Modifications of distressed loans and type of modification, including interest rate reductions, forbearance, principal reduction, or repayment plans in which the outstanding loan amount increases, and an indication of whether the modification was executed under the Federal Home Affordable Modification Program (HAMP), another Federal program, or the institution's own modification program

- h. Real Estate Owned properties
- i. Defaults and delinquencies on home loans reported for the entire city, not by census tract
- 2. Small Business Loans. Loans to small businesses with revenues above \$1 million will be reported separately from loans to small businesses under \$1 million. The depository will use the same reporting procedures as mandated by CRA.
 - a. Total number and dollar amount of small business loans for the entire city.
 - b. Total number and dollar amount of small business loans for each census tract in the city.
 - c. Total number and dollar amount of small business loans for minority and women-owned business enterprises for the entire city.
- 3. Community Development Loans and Investments. Each loan and investments will be designated as affordable housing, small business development, economic development, community facilities, or another activity as defined by the CRA.
 - a. Total number and dollar amount of community development loans for the entire city.
 - b. Total number and dollar amount of community development loans for each census tract.
- **4. Branches and Deposits.** Number of branches and ATMs in the city as well as the address of each branch and ATM with the number and dollar of deposits for each branch.
- 5. Consumer Loan Data (only required by banks that choose to collect the data for CRA consideration).
 - a. Number and dollar amount of consumer loans for the entire city.
 - b. Number and dollar amount of consumer loans for each census tract.
- **6. Workforce Diversity.** Number and proportion of minorities, females, and city residents employed for each bank delineated by employees, senior management, and members of the board of directors.
- **7. Annual Report.** Most recent annual report or SEC-10K report with quarterly financial updates and other filings.
- 8. CRA Exam. Most recent CRA exam evaluation.
- **9. Branch Closing Policy.** A copy of the institution's branch closing policy.
- 10. Financial education efforts in the community.

Describe in a brief narrative the activities or efforts of your institution to provide financial education in the City of St. Louis. This includes but is not limited to participation in events, outreach, special projects, or resources (financial or otherwise) provided to organizations in support of financial education and empowerment.

We realize that this is a new process and very different from what we have asked for in the past. However, this process is not meant to be punitive in nature. It simply gives us an opportunity to have a complete picture of your financial institution, as the HMDA report previously submitted only highlights one part of your business.

In addition to submitting your annual HMDA for calendar year 2013, a copy of this letter, instructions for completion, and an excel template for reporting purposes is located on our website. This information, as well as the signed affidavit with original signatures, must be received in the Treasurer's Office on a USB flash drive no later than March 7, 2014.

If you have any questions, please do not hesitate to contact me at (314) 622-3434.

Sincerely,

Tishaura O. Jones,

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Treasurer